

LF 028  
(Rev. 10/03/2022)

**PRISONER CIVIL RIGHTS COMPLAINT**  
**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF GEORGIA**

FILED IN CLERK'S OFFICE  
U.S.D.C. Atlanta

APR 19 2023

Ronnie Augustus Williams X0213156 4sw 208

(Enter above the full name and prisoner identification number of the plaintiff, GDC number if a state prisoner.)

KEVIN P. WEIMER, Clerk  
By: Kimberly [Signature] Deputy Clerk

**1:23-CV-1797**

-VS-

DeKalb County Jail  
Former Sheriff: Jeffery Mann  
Head Sheriff: Melody Maddox

Captain: S. Terry  
Sheriff: D/O Jenkins  
Officer: Soares  
Officer: SPT Fears

Officer: Falade

County Commissioner: Mereda Davis Johnson  
(Enter above the full name of the defendant(s).) County Operating Officer: Zach Williams

**NOTICE**

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the Court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

**I. Previous Lawsuits**

A. Have you filed other lawsuits in federal court while incarcerated in any institution?

Yes ( ) No ( X )

B. If your answer to A is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline. Even if you do not know all of the information regarding a particular lawsuit, please include the information you do know to assist the Court in identifying your prior lawsuits.)

1. Parties to this previous lawsuit:

Plaintiff(s):

N/A

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- Defendant(s): N/A
2. Court (name the district): N/A
3. Docket Number: N/A
4. Name of judge to whom case was assigned: N/A
5. Did the previous case involve the same facts?  
Yes ( ) No (✓)
6. Disposition (Was the case dismissed? Was it appealed? Is it still pending?):  
N/A
7. Approximate date of filing lawsuit: N/A
8. Approximate date of disposition: N/A

## II. Exhaustion of Available Administrative Remedies

In general, prisoners must exhaust available administrative remedies (such as the prison's grievance procedures) before filing an action in federal court. 42 U.S.C. § 1997e(a). Your case may be dismissed if you have not exhausted your available administrative remedies before filing your case.

- A. Place of Present Confinement: DeKalb County Jail
- B. Is there a prisoner grievance procedure in this institution?  
Yes (✓) No ( )
- C. Did you present the facts relating to your complaint under the institution's grievance procedure?  
Yes (✓) No ( )
- D. If your answer is YES:
1. What steps did you take and what were the results?  
I have dates I filed grievances, dates I received responses, and the Staff person who responded. I did the First Appeal, Second Appeal.

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The grievances wasn't resolved. The administrative appeal process has been exhausted. To no avail. I have Witnesses Stated. Time of incident, date of incidents, name of staff involved. Names of detained person involved. Narrative of the incidents. Resolution desire. To no Avail.

2. If your answer is NO, explain why not:

N/A

### III. Parties

(In item A below, place your name in the first blank and place your present address in the second blank.)

- A. Name of Plaintiff: Ronnie Augustus Williams

Address(es): 4425 Memorial Dr  
Decatur, GA 30032

(In item B below, place the full name of the defendant in the first blank, his/her official position in the second blank, and his/her place of employment in the third blank. Do the same for each additional defendant, if any.)

- B. Defendant(s): Former Sheriff: Jeffery Mann. Head Sheriff: Melody Maddox.  
County Commissioner: Mereda Davis Johnson. County Operating Officer: Zach Williams  
Captain: S. Terry. Sheriff: Dlo Jenkins. Officer: SPT Fears. Officer: Soares  
Officers: Falade  
Employed as Staff at the DeKalb County Jail  
at DeKalb County Jail

### IV. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

- A. Are you bringing suit against (check all that apply):

( ) Federal official (a *Bivens* claim)  
(☒) State or local officials (a § 1983 claim)



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- B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

"The Eighth Amendment", "Under Color of State Law", FTCA  
Inhumane Conditions, Cruel & Unusual punishments, Unsafe, un  
Sanitation, Negligence, I I E D, Due Process clause of the Fourteenth Amendment.

- C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

N/A

#### V. Prisoner Status

Indicate whether you are a prisoner or other confined person as follows (*check all that apply*):

- ☒ Pretrial detainee  
☐ Immigration detainee  
☐ Convicted and sentenced state prisoner  
☐ Convicted and sentenced federal prisoner  
☐ Other (*explain*) \_\_\_\_\_

#### VI. Statement of Claim

State here as briefly as possible the facts of your case. Tell the court WHAT you contend happened to you, WHEN the incident(s) you complain about occurred, WHERE the incident(s) took place, HOW your constitutional rights were violated, and WHO violated them. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

Objective = exposed to serious harm "Black Mold and Asbestos.  
Subjective = Jail official knew Black Mold was in the jail, but didn't  
respond reasonably. Defendants are staff at the DeKalb County Jail  
or were staffed there or the County. Unsafe - UnSanitation. Inhumane  
Conditions. Black Mold is growing. Asbestos. Air Quality is Poor. 24  
gallons of water is leaking daily from toilets with human waste in  
it, and sinks are stopped up. Bugs on our food, and in living areas.  
Earwings, Flies, ants, roaches, Red Bugs, etc. Cold food everyday.  
No Recreation, No Hygiene, No Hair Cuts, No Razors, No Toe Nail Clippers.  
Short on Staff. No security check ups to prevent suicides,  
Murders and stabbings. Inmates doors don't lock, they're all broken.  
Live electric wires are hanging from room lights, Showers, and TV.  
Former Head Sheriff: Jeffery Mann requested in 2019, 9.5 million dollars  
in funding to address mold and Asbestos issues in dormitories, Kitchen,  
and other common areas, but only received 2.3 million, far short



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of the needed "Emergency Fundings". Cruel and Unusual Punishments. No preliminary Hearings, Probable Cause Hearings. No Indictments, Unreasonable bonds, Due Process law Violated. Inmates are also being held 3 days after there Suppose to be released. (False Imprisonment). I have a mental health illness. Mental Health doctors changed my medications, enhancing the chemical in balance in my brain. Staff refusing medical attention. I'm diagnosis with, Anxiety, Depression, PTSD, Bipolar. Severe psychological harm is done. Covid-19 is Spreading, because every inmate use the Same plunger on this floor (180 inmates). I have lungs and Severe mental health problems due to the conditions of this jail. It's harm, harm, harm done. "Black Mold" is everywhere. The Southern Center for Human Rights has investigated this jail. Investigator Name: Dominique Mabre. Address: 60 Walton Street NW, Atlanta, GA 30303. Phone # 404-688-1202. Persons involved, dates, time, and place is 45w Pod 200 in DeKalb County Jail. Witnesses: Detainees in DeKalb County Jail. X0260065 - James Rutledge [REDACTED]. Alonzo Whitehead X2005625. Jonathan Minter X0301854. Timothy Hubbard X1804430. Sherby Price X0255476. Michael French X0423331. Carlos Taylor X0468536. Myron Ballamy X2311586. During a 4 1/2 month period in 45w Pod 200. But the jail has been inhumane, unsafe and Unsanitation conditions Since 2019. To No Avail. Inmates are sleeping on the floor. I have exhaustion the grievances system. I've been in pod 45w 200 Since Dec 9, 2022.

## VII. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

I have ongoing pain from breathing in the Black Mold and Asbestos. Pain in lower back area. Coughing up Black mucus. Headache, etc. Mental Health illness, intensified. I get medications for injuries.

## VIII. Relief

State briefly exactly what you want the Court to do for you. Make no legal arguments. Cite no cases or statutes. If requesting money damages, include the amounts of any actual and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

Injunctions to make changes in this jail conditions and Stop ongoing conduct that the Court find to be illegal. I ask the Court for preliminary Injunctions and Permanent Injunctions. Money damages for the harm I suffered. Nominal damages, compensatory damages, for pain and Suffering and an actual physical injury. Punitive damages, because of reckless or Callous indifference to my rights. The officials Knew and Known the Black Mold and Asbestos was dangerous and that it would harm me and hurt my body and organs if I was continually exposed to it. Damages Under the PLRA. There is no amount of money that can compensate me for living in these inhumane Conditions. But the jail makes 100 million a year. So I'm asking for that amount.

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Signed this 1 day of April, 2023.

Rennie Williams  
Signature of Plaintiff

STATE OF GEORGIA  
COUNTY (CITY) OF DEKALB

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED ON 4-1-2023  
(Date)

Rennie Williams  
Signature of Plaintiff